

- (3) by striking "which would be determined under section 55(b)(1)(A)" in paragraph (2)(A)(ii) and inserting "which would be the pre-credit tentative minimum tax". and
- (4) by adding at the end thereof the following new paragraph:

"(3) PRE-CREDIT TENTATIVE MINIMUM TAX.—For purposes of this subsection, the term "pre-credit tentative minimum tax" means—

"(A) in the case of a taxpayer other than a corporation, the amount determined under the first sentence of section 55(b)(1)(A)(i), or

"(B) in the case of a corporation, the amount determined under section 55(b)(1)(B)(i)."

- (5) 1201(a) and 1561(a) are each amended by striking "last sentence" each place it appears and inserting "last 2 sentences"

- (6) AMENDMENTS RELATED TO SECTION 13222.—
- (1) Subparagraph (B) of section 6033(e)(1) is amended by adding at the end thereof the following new clause:

"(iii) COORDINATION WITH SECTION 527(1).—This subsection shall not apply to any amount on which tax is imposed by reason of section 527(f)."

- (2) Clause (i) of section 6033(e)(1)(B) is amended by striking "this subtitle" and inserting "section 501".

(h) AMENDMENT RELATED TO SECTION 13225.—

Paragraph of section 6655(a) is amended by striking all that follows

month in the sentence following subparagraph (C) and inserting

"subparagraph (e)(2)(A) shall be applied by substituting 2 months for 3 months in clause (i)(I). the election under

clause (e)(2)(C) may be made separately for each installment. and

clause (ii) of subparagraph (e)(2)(C) shall not apply."

- (7) Subparagraph (G) of section 904(d)(3) is amended by striking "section 951(a)(1)(B)" and inserting "subparagraph (B) or (C) of section 951(a)(D)".

- (8) Paragraph (1) of section 956A(b) is amended to read as follows:

"(1) the amount (not including a deficit) referred to in section 316(a)(1) to the extent such amount was accumulated in prior taxable years beginning after September 30, 1993, and".

- (9) Subsection (f) of section 956A is amended by inserting before the period at the end thereof: "and regulations coordinating the provisions of subsections (c)(3)(A) and (d)".

- (10) Subsection (b) of section 958 is amended

by striking "956(b)(2)" each place it appears and inserting "956(c)(2)"

(5)(A) Subparagraph (A) of section 1297(d)(2) is amended by striking "The adjusted basis of any asset" and inserting "The amount taken into account under section 1296(a)(2) with respect to any asset".

(B) The paragraph heading of paragraph (2) of section 1297(d) is amended to read as follows:

"(2) AMOUNT TAKEN INTO ACCOUNT.—"

(6) Subsection (e) of section 1297 is amended by inserting "For purposes of this part—" after the subsection heading.

(f) AMENDMENT RELATED TO SECTION 13241.—

Subparagraph (B) of section 40(e)(1) is amended to read as follows: